

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division

JAMES A. LEWIS, JR,

Plaintiff,

v.

Civil No. 3:25-cv-00053-DJN

EQUIFAX INFORMATION SERVICES, LLC
EXPERIAN INFORMATION SOLUTIONS, INC.
TRANS UNION, LLC, and
CAPITAL ONE BANK, NA,

Defendants.

**DEFENDANT TRANS UNION LLC’S CONSENT MOTION FOR EXTENSION
OF TIME TO ANSWER OR OTHERWISE RESPOND TO PLAINTIFF’S COMPLAINT**

Defendant Trans Union LLC (“Trans Union”), by and through its attorney of record, and pursuant to Fed. R. Civ. P. 6(b)(1)(A), files this Consent Motion for Extension of Time to Answer or Otherwise Respond to Plaintiff’s Complaint and states as follows:

1. Plaintiff, James A. Lewis Jr., filed the Complaint in this action on January 23, 2025. Trans Union was served with the Complaint on January 27, 2025.
2. The current deadline for Trans Union to answer or otherwise respond to the Complaint is February 17, 2025. Trans Union requests an extension of that deadline, up to and including March 10, 2025.
3. Trans Union needs additional time to locate and assemble the documents relating to Plaintiff’s credit file and any dispute submitted by Plaintiff. In addition, Trans Union’s counsel needs additional time to review Trans Union’s documents and respond to the allegations in the Complaint.
4. Plaintiff has agreed to the requested extension.

5. This Consent Motion is filed prior to the expiration of time to answer, plead or otherwise respond under Rule 12(a) of the Federal Rules of Civil Procedure.

5. The extension sought by Trans Union will not prejudice the orderly administration of this matter, and no party will be prejudiced by the extension.

6. Trans Union does not request oral argument on this Motion.

7. No prior extension of this deadline has been requested.

7. A proposed Order granting this Consent Motion is attached hereto.

WHEREFORE, for the reasons stated herein, Defendant Trans Union respectfully requests that this Court grant Trans Union's Consent Motion for Extension of Time to File its Answer or Otherwise Respond to Plaintiff's Complaint and Order that Defendant Trans Union has until on or before March 10, 2025, to file its answer or otherwise respond to Plaintiff's Complaint.

Respectfully submitted,

/s/ Marc F. Kirkland

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DATED: February 11, 2025.

CERTIFICATE OF SERVICE

I hereby certify that on the 11th day of February 2025, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will then send a notification of such filing (NEF) to counsel of record registered to use the CM/ECF system in this action, as follows:

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